

# Compliance plan for Manawatu District Council Distributed Unmetered Load for Contact Energy Limited

Title: Deriving Submission Information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: unknown</p> <p>To: 13-Apr-18</p>	<p>The database used to prepare submissions contains some inaccurate information.</p> <ul style="list-style-type: none"> <li>• The database accuracy is assessed to be 99.1% indicating an estimated over submission of 414 kWh per annum.</li> <li>• 56 lamps had incorrect lamp or gear wattages recorded. The errors amount to 190 watts, resulting in under submission of 784 kWh per annum.</li> </ul> <p>The submission calculation excluded gear wattages, which resulted in under submission of 4,307 kWh for February 2018.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls over database accuracy are rated as weak overall, as they are not sufficient to ensure that submission is accurate.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact will work with Manawatu DC to get the DUMML database updated with these correct values and attributes The missing gear wattage values from submission volumes relates to a training issue within Contact Energy's processes and this issue has been addressed. Wash up corrections will flow through via the settlement process.	Dec 2018  May 2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	As above	

<b>Title: Description and capacity of load</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 2.4 With: Clauses 11(2)(c) and (d) of Schedule 15.3 From: unknown To: 13-Apr-18	Three lamps had missing model information. All were corrected during the audit. Potential impact: Low Actual impact: None Audit history: Once previously Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are rated as moderate, as they are sufficient to ensure that most information is complete. There is no impact, because lamp and gear wattage information was correctly recorded for the lamps with missing models. There was no change to the total wattages where the gear wattage had been blank.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Contact will work with Manawatu DC to get the DUMML database updated with these correct values and attributes	Dec 2018	Cleared
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
As above	As above	

<b>Title: Database accuracy</b>	
<b>Non-compliance</b>	<b>Description</b>
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: unknown To: 13-Apr-18	The database used to prepare submissions contains some inaccurate information. <ul style="list-style-type: none"> <li>The database accuracy is assessed to be 99.1% indicating an estimated over submission of 414 kWh per annum.</li> <li>56 lamps had incorrect lamp or gear wattages recorded. The errors amount to 190 watts, resulting in under submission of 784 kWh per annum.</li> </ul> Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2

<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time. The impact is assessed to be low, based on the kWh differences described above.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
Contact will work with Manawatu DC to get the DUML database updated with these correct values and attributes		Dec 2018	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
As above		As above	

<b>Title: Volume information accuracy</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)</p> <p>From: unknown To: 13-Apr-18</p>	<p>The database used to prepare submissions contains some inaccurate information.</p> <ul style="list-style-type: none"> <li>The database accuracy is assessed to be 99.1% indicating an estimated over submission of 414 kWh per annum.</li> <li>56 lamps had incorrect lamp or gear wattages recorded. The errors amount to 190 watts, resulting in under submission of 784 kWh per annum.</li> </ul> <p>The submission calculation excluded gear wattages, which resulted in under submission of 4,307 kWh for February 2018. Incorrect profiles are recorded on the registry for both ICPs.</p> <p>Potential impact: Medium Actual impact: Medium</p> <p>Audit history: None Controls: Weak Breach risk rating: 6</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>Medium</b>	The controls over database accuracy are rated as weak overall, as they are not sufficient to ensure that submission is accurate. The impact is assessed to be medium, based on the kWh differences described above. Profiles were recorded correctly on the registry for most of the audit period.

<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
<p>Contact will work with Manawatu DC to get the DUMML database updated with these correct values and attributes</p> <p>The missing gear wattage values from submission volumes relates to a training issue within Contact Energy's processes and this issue has been addressed. Wash up corrections will flow through via the settlement process.</p> <p>The incorrect profile on the registry issue is a result of a system defect – currently a fix is underway to prevent this issue from occurring. A manual work around is currently in place to update the registry where required</p>	<p>Dec 2018</p> <p>May 2018</p> <p>July 2018</p>	<p>Identified</p>
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
<p>As above</p>	<p>As above</p>	